

**POLICY BRIEFING**

# Recognition of professional qualifications

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This policy brief has four sections:

- A. The European labour market context
- B. Ukraine
- C. Developments in the higher education sector
- D. The legacy of Brexit

In each of these areas, albeit in different ways, higher education stakeholders will commit time and energy in 2023 to dealing with the routine, the predicted and planned, and the unpredictable.

Underpinning all their activities will be features now so well established that they have become disruptive constants: climate change, geo-strategic instability, demographic shifts and workforce shrinkage, culture wars promoted by authoritarian governments, and the inequitable distribution of access to quality higher education.

In the professional disciplines these unwelcome realities have already impacted on curriculum design and programme delivery. Triggering the revision of regulatory practice and EU legislation will take much longer. Many of the items in this briefing attest to this time lag.

Let us hope that rapid progress can be made, particularly in the healthcare sector where the pandemic has accelerated the negative trends already in evidence.

Welcome to 2023 – the thirtieth anniversary of the Single Market and the European Year of Skills!

## **A. THE EUROPEAN LABOUR MARKET CONTEXT**

1.1 In September, European Commission President von der Leyen made her [State of the Union address](#)<sup>1</sup> to the European Parliament. By then, the war in Ukraine and the resulting fuel shortages had displaced the Covid-19 pandemic as the principal factors of disruption. Altogether, they allowed her to announce an array of measures designed to boost resilience and recovery. To **Ukraine** specifically, von der Leyen promised eventual “seamless access to the Single Market” – implying the comprehensive recognition of professional qualifications, as laid down in the relevant EU legislation. At the same time, she noted the ongoing shortfalls in the labour market, citing nurses, engineers and IT technicians in particular, and proclaimed 2023 as the **European Year of Skills** (see para.1.4 below). Acknowledging that expanding relevant training programmes would still not suffice, she pointed to the need for more inward migration and the necessity to “speed up and facilitate the recognition of qualifications of [...] third country nationals”.

1.2 The **EU’s legislative proposals for 2023 and 2024**, the period leading up to the next round of elections to the European Parliament in 2024, maintain the strategic momentum. The Green Deal and the digital transition continue to loom large, as does the effort to build on recommendations made by the [Conference on the Future of Europe](#) (reported in our July briefing). The [Working Document](#) attached to the Joint Declaration by the three EU institutions lists 164 intended legislative measures, many of which are carried over from 2022. However, none deal directly with either education or professional recognition, despite the repeated prioritisation of “recognising third country qualifications as well as supporting learning mobility within the EU”.

1.3 January 2023 is the first month of the **Swedish presidency of the Council**. Its [programme](#) hails the thirtieth anniversary of the Single Market. Here the watchwords are green competitiveness and digital consolidation. The latter includes ease of data exchange among Member States, as well as electronic i/d provisions, which – as previous EUA briefings have discussed – impinge significantly on higher education policy. Education itself comes rather as an afterthought. The programme reiterates the perennial need for upskilling the labour force. It also states its intention to “move the work on the European Education Area forward, for example regarding mutual recognition of qualifications” (see para.3.3 below).

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<sup>1</sup> The link is to the English language version of the speech. Embedded within it is the link to the trilingual (English, French, German) original.

1.4 In October, in the wake of President von der Leyen's address, the Commission put out a [Proposal for a Decision on a European Year of Skills 2023](#). The Proposal sheds more light on the question of recognising the **qualifications of third country nationals**. Article 3.1(g), if and when enacted, will commit the EU and member states to "promoting tools and instruments for increased transparency of qualifications, including qualifications awarded outside the Union". The clear implication is that the full toolbox already exists; it just needs to be utilised as widely, as efficiently and as soon as possible. Indeed, recitals 17 and 18 rehearse a long list of available provisions:

(17) Attracting skilled third-country nationals can contribute to tackling the Union's skills and labour shortages. In October 2021, the revised EU Blue Card Directive entered into force, a key achievement for attracting highly skilled talent into the labour market. The New Pact on Migration and Asylum also places a strong emphasis on labour migration and on integration of third country nationals. Against this background, the Commission adopted a Skills and Talent Package in April 2022 to reinforce the legal framework and Union action in this area. Proposals to recast the Long-Term Residents Directive and the Single Permit Directive will allow to simplify the procedures for the admission of workers of all skill levels to the Union. The Commission will also continue to roll out an EU Talent Pool to facilitate labour matching with non-EU nationals. The Commission is also working towards the launch of tailor-made Talent Partnerships with specific key partner countries to boost international labour mobility and development of talent in a mutually beneficial and circular way. In addition, the Union continues to be the leading contributor to global funding for education focusing especially on teacher training, girls education and vocational education and training. This work, under the umbrella of the Global Gateway strategy, is complementary to the objectives of this proposal.

(18) Trust in and transparency of qualifications, whether acquired in Europe or beyond, is key in facilitating their recognition. EU transparency tools (European Qualifications Framework, Europass, ESCO, EU Skills Profile Tool for third country nationals, European Digital Credentials for Learning) are a starting point to help increase the transparency and comparability of qualifications. [...]

Publication of the Proposal was followed by a **public consultation** – too late, in the [view of the European Students' Union](#) (ESU), given that proceedings in the European Parliament had already gone beyond the amendment stage. ESU called for regular consultation and the opportunity to co-design the Year of Skills as it progresses. It also considered that the Proposal understated the role of higher education in general, and of transversal skills in particular. With respect to third country nationals, ESU urged "more concrete steps on the integration of migrants and refugee learners, by easing access to and supporting their access to education, through dedicated educational pathways as well as easing the recognition of their qualifications, including by widening the application of the European Qualifications Passport for Refugees. Alongside ensuring parallel educational pathways for persecuted students through Students at Risk schemes."

1.5 EUA briefings have regularly reported on initiatives emanating from the European Commission's DG EAC (Education, Youth, Sport and Culture) and DG EMPL (Employment, Social Affairs and Inclusion). Readers may not be as familiar with the work of **DG REFORM**. It dispenses funding for structural reforms prioritised by member states. For an October 2022 deadline, its [Flagship Technical Support Project 2023](#) invited bids for, among other strands, national programmes of support for the **development of green and digital skills**. The prospectus set out the criteria as follows:

- ◆ Map the training and education needs of workers and entrepreneurs, with a focus on digital and green skills;
- ◆ Identify barriers hindering the development of such skills;
- ◆ Provide recommendations to strengthen the governance, legislation, funding and tools for the further development of green and/or digital skills and competences of the workforce;
- ◆ Communication and dissemination activities.

If and how these reforms would develop at inter-governmental level is not spelt out. The outcomes would surely have cross-border implications, even if they took a long time to surface. They might well involve the design and delivery of new training programmes leading to new qualifications, in which case the integration of the latter into the full range of European recognition instruments, both academic and professional, would be essential.

1.6 DG EMPL, meanwhile, has expanded its voluminous Pact for Skills portfolio to include a new [Skills partnership for the digital ecosystem](#). The Commission will support consortia of public and private bodies with a direct interest in **re- and upskilling working-age people for the digital labour force**. Higher education institutions committed to regional economic development and adult education are expected to play a significant role. Oversight of the Pact falls to the DG's Unit B2, where Ann Branch has taken over from Alison Crabb as Head of Unit. Organisations and groups of organisations in the EU, EEA and candidate countries with relevant profiles and activities are invited to [sign up](#) to the Pact. According to information available in October, 700 organisations and 12 large partnerships had already pledged six million training opportunities.

1.7 The EU's **taxonomy of European Skills, Competences, and Occupations** (ESCO) maps national job classifications onto a European template. Thus far, 21 countries have submitted their national taxonomy to ESCO and four have directly adopted ESCO in their own systems (Greece, Iceland, Finland, Ireland). ESCO recently posted the [mapping tables](#) on its website.

1.8 As President von der Leyen pointed out, the **EU healthcare workforce** is in dire need of regeneration. DG SANTE (health and food safety) has given its [EU Health Policy Platform](#) a strong focus on high-level skills, thereby bearing directly on curriculum and staff development in the higher education sector. Committed to develop a long-term data-based workforce strategy, it calls for the integration of digital skills into training programmes and proposes "pan-European digital academies for clinicians".

1.9 The pandemic shone a bright light on the absence of EU-wide automatic recognition procedures for **intensivists** (i.e. qualified intensive care specialists). A briefing note put out by the [European Policy Centre](#) indicates that during Covid-19, when emergency intensive care provision was in short supply, it was easier for national health authorities to transfer patients across borders than to transfer doctors. At the time, the EU's Emergency Support Instrument funded training for ancillary and support staff working in Intensive Care Units (ICUs), but failed to urge member states to agree minimum training requirements for intensivists and to enshrine them in Directive 2005/36/EC. Readers of EUA briefings will know that the issue has been raised at meetings of the Commission's Group of Coordinators. There are a number of ways forward:

- ◆ The Group of Coordinators has pondered the possibility of using the facility of partial access as a way around discrepant national regulatory practices.
- ◆ EPC proposes building on the competence-based curriculum developed by the LEONARDO project [International Competency Based Training in Intensive Care Medicine for Europe](#) (CoBaTrICE).
- ◆ The Directive's facility for elaborating Common Training Frameworks remains open, although it has proved in the past to be a difficult route to take.

1.10 In November, the **Council of European Dentists** (CED) published a white paper on [workforce challenges for dentistry](#). It pressed for action to eliminate the medical deserts caused, in the case of dentistry, by a number of factors: Covid-19, Brexit, the brain drain of qualified practitioners from east and central Europe to the west, and the growing preference for young dentists to take jobs in corporate chains and cosmetic surgery. The Council also reiterated its oft-repeated appeal for a **delegated act** to amend and update the dentistry entry in Annex V 3/5.3.1 of the Directive. ([Delegated acts](#) can be used to amend the detail of the knowledge, skills and competences required, but cannot change the essential logic of the legislation. They must be approved by the Council of the EU and the European Parliament.)

The CED white paper also made recommendations to the higher education sector:

- ◆ Universities should offer expanded education and trainings for dentists, incorporating skills such as digital skills, and practice and team management.
- ◆ National governments consider increasing the publicly funded places on dental university courses if there is a need for more dentists within their specific health systems.
- ◆ In order to increase the interest among university applicants, national governments should consider information campaigns promoting dentistry as a liberal profession of importance for public health and society as a whole.
- ◆ Notwithstanding the problems of medical deserts, CED urged national regulators to continue evaluating with all due rigour the qualifications of third country nationals.

1.11 Meanwhile, the Association for Dental Education in Europe (ADEE) identified other priorities in its [Strategic Plan 2022-25](#): the promotion of inter-professional oral health education; the alignment of **dental education** with the sustainable development goals; and the further integration of its quality assurance practice into the framework of ENQA's Standards and Guidelines (ESG).

1.12 Previous EUA briefings have mentioned the **healthcare workforce mapping reports** commissioned by DG GROW. The SPARK consultancy had published its [mapping of general care nursing](#) in 2020. Three more SPARK reports appeared in 2022. In January, its [mapping of dentistry](#) made recommendations regarding the updating of the EU legislation on **dental practitioners**, but these went less far than those of the CED and, to the [disappointment of the Council](#), failed to echo its call for a delegated act.

1.13 SPARK's [mapping of pharmacists](#) also appeared in January 2022. It made recommendations for additions to the **basic pharmacy curriculum** in the areas of biotechnology, patient-centred care and safety, health promotion and economics, and IT skills. Here too, these did not completely tally with the [proposals](#) advanced by five of the main sectoral groups.

1.14 Similar outcomes attended the SPARK [mapping of veterinary surgeons](#): the recommendations fell short of the **veterinary sector's proposals**. One pleasing aspect of the mapping exercise was its recommendation that Article 38 of the Directive be revised to include the requirement that fully trained professionals possess "adequate knowledge and understanding of the One Health concept, including skills and competences for its application and integration in veterinary public health." EUA briefings have regularly covered the **One Health** initiative, on the grounds that the greater integration of human health, animal health and pharmacy studies – desirable in itself, as Covid-19 has shown – poses significant challenges to higher education institutional structures, funding mechanisms and curricula. The **Federation of Veterinarians of Europe** (FVE), one of the driving forces behind One Health in Europe, is currently co-editing an [upcoming publication](#) which will welcome relevant contributions. FVE has also renewed its [memorandum of understanding](#) with the **Standing Committee of European Doctors** (CPME).

1.15 The three SPARK mapping reports published this year have been received less than enthusiastically by dentists, pharmacists and veterinarians. At issue is the degree of urgency to be attached to the **updating of the Directive**. These professions want it now. What the Commission actually intends is unclear. DG GROW was one year late in its production of the implementation report scheduled for 2019. The next report is due in 2024. Hopefully, it will arrive on time and contain concrete plans for the comprehensive overhaul of the Directive. Piecemeal amendment by a series of delegated acts is much more likely. (Note that one delegated act attaching to the Directive is currently in draft and out for public consultation. Although it concerns [ski instructors](#) and is of little relevance to the higher education sector, it gives an idea of what delegated acts in the sectoral professions might look like.)

1.16 The **medical practitioners** represented by the CPME do not feel the same pressing need to amend the Directive. Current CPME priorities lie instead in the field of digital competences and training. Two proposals currently in the legislative process are particularly relevant:

- ◆ The Commission's [proposal of a Regulation on Artificial Intelligence](#), which aims to set ethical rule-based parameters for the use of AI. Its focus is on 'high-risk' AI practices – those which might endanger the health and safety of citizens or curtail their fundamental rights. Such practices are deployed in the recruitment of professionals and students. Recital 35 of the draft Regulation makes the point:

“AI systems used in education or vocational training, notably for determining access or assigning persons to educational and vocational training institutions or to evaluate persons on tests as part of or as a precondition for their education should be considered high-risk, since they may determine the educational and professional course of a person's life and therefore affect their ability to secure their livelihood. When improperly designed and used, such systems may violate the right to education and training as well as the right not to be discriminated against and perpetuate historical patterns of discrimination.”

It is curious that while the draft Regulation's Annex III lists broad areas of high-risk AI practice, including education and employment, it fails to highlight health. In healthcare, AI techniques are used in, for example, diagnostics, medical device safety features and the triage of patients in emergency care. [CPMI policy](#) identifies further applications.

- ◆ These applications feature in the [proposed Regulation on the European Health Data Space](#) (EHDS) which seeks to ensure that health data is accessible by health professionals, researchers, trainers and policy-makers on a non-discriminatory basis and that access to personal data is controllable by the individual. [CPME's position paper](#) considers that the proposal pays insufficient regard to the implications of EHDS for the role and competences of doctors.

1.17 DG GROW has initiated **infringement proceedings** against a number of member states:

- ◆ In July, against Cyprus, for failure to transpose and implement [DIR EU/2018/958](#) on the respect of proportionality when introducing new regulatory procedures in the field of professional qualifications; and for failure to fully transpose [DIR EU/2019/1159](#) in relation to the minimum level of training for seafarers;
- ◆ In July, against Slovenia and Spain, for failure to transpose DIR EU/2017/2397 [not accessible in the CELEX database] on the professional qualifications of inland navigators;
- ◆ In September, against Belgium, for failure to transpose and implement [DIR EU/2018/958](#) on the respect of proportionality when introducing new regulatory procedures in the field of professional qualifications.

1.18 Successive EUA briefings have followed the long saga of the **Mutual Recognition Agreement (MRA) on the professional qualifications of architects**. So it is pleasing to report that the MRA has now been [confirmed](#) by the Architects Council of Europe (ACE) and the Regulatory Organizations of Architecture in Canada (ROAC). And it has been duly [celebrated](#) by the Joint Committee of the EU-Canada Comprehensive Economic and Trade Agreement (CETA). The MRA is the first of its kind and a regulatory breakthrough for the EU.

1.19 In December the EU signed an Advanced Framework Agreement (AFA) with the new government in **Chile**, updating an earlier accord. Its [chapter 14 on the mutual recognition of qualifications](#) appears to follow the CETA model, inviting professional bodies to explore the possibilities for mutual recognition, bearing in mind economic need and whatever degree of compatibility might already exist. However, successful meetings of professional minds approved by the relevant AFA committee will yield only Mutual Recognition *Arrangements*, rather than *Agreements*. These would set the conditions under which the Competent Authorities could agree recognition procedures, rather than determining that recognition be automatic.

1.20 The EU's Free Trade Agreement (FTA) with **New Zealand**, also recently signed, follows a similar path. [Article 10.39](#) refers simply to a 'Mutual recognition instrument' [sic]. Both *arrangement* and *instrument* are weaker specifications than *agreement*. They presumably nurture the hope that understandings might be reached more expeditiously than in the case of the CETA.

1.21 Meanwhile, Germany and India have signed a **German-Indian Migration and Mobility Agreement**, the text of which has not yet been published. The [Federal Ministry press release](#) does not disclose its exact terms, but it is likely to include recognition procedures that are more light-touch than those currently in place. The initiative is in line with President von der Leyen's address reported above. It also follows the UK precedent (see para.4.4 below).

1.22 **ESCO** (see para.1.7 above) and **O\*NET**, the Occupational Information Network developed by the U.S. Department of Labor/Employment and Training Administration, have engineered a mutual cross-referencing – known as a [crosswalk](#) – designed to support their inter-operability.

1.23 The **EU-Western Balkans summit meeting** held in December resulted in the [Tirana Declaration](#), in which the EU commended 'the Partners' recent agreements on [...] mutual recognition of university diplomas and professional qualifications within the region.' It hailed them as an important step towards the completion of the Western Balkans Common Regional Market.

1.24 The Commission chairs the **Group of Coordinators** which brings together national government representatives in the field of professional recognition. We normally report on its activities, but since our July briefing no sets of minutes have been published. EUA has taken the matter up with DG GROW.

## B. UKRAINE

2.1 In November, the EU's [Health Policy Platform](#) [access by registration] held a webinar to review support for Ukraine, neighbouring EU member states and Moldova. (Ukraine and Moldova officially became EU candidate countries in June 2022.) The **European Federation of Nurses Associations** (EFN) reported that the Polish government had accredited 1,200 Ukrainian nurses who had relocated to Poland. This was in large measure facilitated by bridging courses designed by EFN and its partners.

2.2 Polish **physiotherapists** have been equally active, providing an online information and training service and assisting Ukrainian professionals with recognition procedures. Prior to the invasion, Ukraine had 3,000 physiotherapists. The **European Association of Service providers for Persons with Disabilities** (EASPD) was unable to establish how many had left the country and how many remained, but had set up contact points in all the likely receiving countries. Professional bodies in Denmark, Ireland and the UK offered free membership, while those in Germany, Norway and Romania were processing applications from Ukrainians who had no access to their documentation. For those with documentation, a number of national bodies were providing translation services.

2.3 The EU's **European Labour Authority** has set up a pilot '[talent pool](#)' to facilitate Ukrainian refugees' access to the EU labour market (cf. para.1.4 above). In the **UK**, a comprehensive advisory service for Ukrainian refugee professionals is provided by the [Centre for Professional Qualifications](#).

2.4 The elegantly re-modelled [ENIC-NARIC website](#) carries regularly updated guidance on the **recognition of Ukrainian qualifications**.

2.5 Work proceeds on the referencing of the **Ukrainian national qualifications framework** to the EQF and a comparison report on the two frameworks is due to be published imminently.



2.6 In June, EURYDICE published an [overview](#) of the **measures taken by 35 countries** (EU member states, EEA countries and candidate countries) to support Ukrainian citizens entering or hoping to enter their higher education systems. The overview also covered the extent to which the relevant Article of the Lisbon Recognition Convention is implemented and accurate data collected. It found considerable variations in practice.

2.7 In July, **EUA** granted membership to the Union of Rectors of Higher Education Institutions of Ukraine. This followed a dramatic rise in the number of Ukrainian higher education institutions joining EUA – from 26 prior to March 2022, to 35 currently. EUA has set up a [task force](#) to assist in the reconstruction of the Ukrainian higher education system. EUA also collaborated in the establishment of the [MSCA4Ukraine scheme](#) for researchers, coordinated by **Scholars at Risk**. The scheme, which manages EU funding for dedicated fellowships, closed its application portal in November following heavy demand.

2.8 The Council of Europe and the EU have jointly funded a [project](#) which will extend Italian implementation of the **European Qualifications Passport for Refugees** (EQPR) from academia to other public sector administrations. In addition, the Council’s legal instrument supporting the EQPR will be updated in 2024.

### C. DEVELOPMENTS IN THE HIGHER EDUCATION SECTOR

3.1 The **Lisbon Recognition Convention** (LRC) is now 25 years old. In November, the [Convention Committee](#) elected new officers and adopted the second monitoring report on LRC implementation. The link will appear on the [Council of Europe publications site](#), where the 2019 report is still available.

3.2 Sadly, progress in digitalisation has driven academic fraud high up the LRC agenda. Council of Europe ministers adopted Recommendation CM/Rec(2022)18 in July, together with its extremely useful explanatory memorandum. The two documents present definitions and policy guidelines, all proceeding from one central statement:

“Education fraud” is behaviour or action occurring in the field of education intended to deceive and obtain an unfair advantage. It includes: (i) the activities of diploma mills, accreditation mills, visa mills, essay mills and essay banks [...]; (ii) impersonation by undertaking in whole or in part any work or assessment required as part of a programme in the place of an enrolled learner; (iii) illegal or irregular use of authentic documents; (iv) plagiarism; (v) production or use of forged, plagiarised or counterfeit documents; and (vi) the offer of unrecognised or unaccredited qualifications with the intention of deceiving another.

The Recommendation is addressed to employers as much as to the higher education sector. The current exposé by the *Financial Times* (15 July, 7 December) of cheating in examinations set by global auditing firms is a timely reminder of the need for vigilance in recognising professional qualifications. On 2 January the *FT* reported that the US Public Company Accounting Oversight Board (PSAOB) had imposed fines to the value of USD 11mn – a massive sum which, happily, it was able to put into its higher education scholarship fund. It is clear that digitalisation opens up new possibilities for fraudsters, while at the same time potentially extending credential evaluators’ forensic capacities. Training them to meet these new challenges is imperative.

3.3 Readers will be aware that the European Education Area (EEA) is an entity distinct from, but overlapping with, the European Higher Education Area (EHEA). The former is a European Union initiative, covering the primary, secondary, vocational, adult and higher education sectors. The latter is HE-specific but wider in geopolitical extension. The European Commission’s assessment of [progress towards the achievement of the EEA](#) signals the creation of a **European Quality Assurance and Recognition System** by 2025. Its “objective will be to review current quality assurance and recognition arrangements and ensure that they are fit for purpose in the context of an evolving higher education landscape.” The progress report gives no indication of how this is to be achieved, except to promise consultations in 2023. In view of the EU’s legislative priorities (see para.1.2 above), there will be no rush to legislate.

3.4 The [TPG-LRC Constructing Recognition in the EHEA \(TPG-LRC CoRE\)](#) project, coordinated by the Italian NARIC on behalf of the Bologna Follow-up Group, continues its work on two fronts. Its working group on the **quality of recognition**, which includes EUA, is soon to distribute a questionnaire to higher education institutions to determine whether and how they control the quality of their recognition procedures. Another working group – on the **digitalisation of recognition tools** – is due to arrange three peer learning activities in the course of 2023 and 2024.

3.5 Other developments in the higher education sector include:

- ◆ The Commission's EQF Advisory Group is working internally on the question of how to ensure that **international qualifications** are assigned to national qualification levels consistently country-by-country.
- ◆ The Commission's Joint Research Centre has concluded a consultation on the development of a **European Digital Skills Certificate** (EDSC), the results of which should be made public in the first part of 2023.
- ◆ Two events in September addressed the still incomplete implementation of **learning outcomes** in curriculum design and credential evaluation. The European Centre for the Development of Vocational Training [CEDEFOP](#) approached the issue from the angle of transparency and transferability, while the Latvian NARIC and the [QUATREC 2](#) project examined issues of formulation and comparison.
- ◆ CEDEFOP is also finalising its guidelines to the **validation of non-formal and informal learning** (NFIL). It envisages four phases in the validation process: identification, documentation, assessment, certification.
- ◆ The **recognition of prior learning** (RPL) is not new, but practice has proved erratic. Its guiding principles, formally shared across the EHEA, stand in need of consistent and reliable implementation. To this end, AQ Austria, the national quality assurance agency, is heading up a new [European RPL Network](#), of which EUA is a member.

## D. THE LEGACY OF BREXIT

4.1 The UK labour market is not in good shape. Its difficulties are attributable to a number of factors:

- ◆ The loss of free movement of citizens following Brexit;
- ◆ The lack of scope for negotiation with the EU on mutual recognition, due to the impasse caused by fundamental disagreement on the Northern Ireland Protocol;
- ◆ Strong resistance to immigration in some sections of the population, as well as in a powerful segment of the governing Conservative Party;
- ◆ The cost of living crisis which has exacerbated problems of recruitment and retention in the public sector;
- ◆ The absence of comprehensive and well-funded upskilling programmes.

4.2 In November the Nuffield Trust, an influential think tank with a strong healthcare focus, compared the upward trend in recruitment of specialists from EEA countries in the five years pre-Brexit with the situation in the five years post-Brexit. The [Nuffield charts](#) show the extent to which the trend faltered in the cases of **anaesthetists, specialist paediatricians, cardio-thoracic surgeons** and **psychiatrists**.

4.3 In order to increase the inflow of third country healthcare workers, the UK government has recently published a [draft Dentists, Dental Care Professionals, Nurses, Nursing Associates and Midwives \(International Registrations\) Order 2022](#). The Order amends existing legislation in such a way as to facilitate the **registration of qualified non-UK citizens**. There is bound to be anxiety concerning the extent to which the proposed changes put quality and patient safety at risk. Until the government publishes a summary of its consultation process, it will not be clear how widespread the reservations are.

4.4 In the transition from the short-lived Truss administration to the current government led by Prime Minister Sunak, UK trade policy changed gear. No longer placing speed of agreement above all else, it wisely shifted its focus to substance. This is evident in its discussions with **India**. In July, the two governments agreed a bundle of measures:

- ◆ A [Memorandum of Understanding on the mutual recognition of academic qualifications](#). The MoU covers the upper secondary qualifications normally used for access to higher education, as well as the three Bologna cycles (but without mentioning Bologna). Universities UK has welcomed the readiness of India to recognise UK master's degrees as a gateway to the Indian labour market. Note that "professional degrees in the fields of Engineering, Medicine, Nursing, Pharmacy, Law, and Architecture are explicitly excluded" from the scope of the MoU.
- ◆ A [Framework Agreement on Healthcare Workers](#). Exclusion from the MoU is purely procedural in the case of nurses and other healthcare workers. It is to allow time for further deliberation. The two governments want to conclude the recognition of **nursing qualifications** by July 2023, a resolve backed by UK training programmes delivered in India to UK regulatory standards. This represents a first step (and the most urgent in terms of UK need), to be followed by similar initiatives targeting **occupational therapists, dieticians, radiographers**, and a host of other professions.
- ◆ A further [MoU on the training and certification of seafarers](#). This measure allows the UK to recognise certificates issued by the Indian government, conditional on compliance with the relevant international treaty.

Comments and corrections are welcome:

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